

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

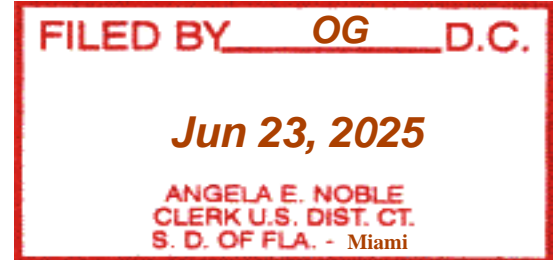
CASE NO. 25-MJ-03219-Torres

UNITED STATES OF AMERICA

v.

JACOB MELVIN HART,

Defendant.



CRIMINAL COVER SHEET

1. Did this matter originate from a matter pending in the Central Region of the United States Attorney's Office prior to October 3, 2019 (Mag. Judge Jared M. Strauss)? No
2. Did this matter involve the participation of or consultation with Magistrate Judge Eduardo I. Sanchez during his tenure at the U.S. Attorney's Office, which concluded on January 22, 2023? No
3. Did this matter involve the participation of or consultation with Magistrate Judge Marty Fulgueira Elfenbein during her tenure at the U.S. Attorney's Office, which concluded on March 5, 2024? No
4. Did this matter involve the participation of or consultation with Magistrate Judge Ellen F. D'Angelo during her tenure at the U.S. Attorney's Office, which concluded on October 7, 2024? No

Respectfully submitted,

HAYDEN P. O'BYRNE
UNITED STATES ATTORNEY

By: /s/ Andres E. Chinchilla
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UNITED STATES DISTRICT COURT

for the
Southern District of Florida

United States of America

v.

JACOB MELVIN HART,

Defendant(s)

)
)
) Case No. 25-MJ-03219-Torres
)
)
)

CRIMINAL COMPLAINT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 21, 2025, in the county of Miami-Dade in the
Southern District of Florida, the defendant(s) violated:

Code Section

Offense Description

18 U.S.C. § 2252(a)(1) and (b)(1)

Transportation of Child Pornography

18 U.S.C. § 2252(a)(4)(B) and (b)(2)

Possession of Child Pornography

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT.

☒ Continued on the attached sheet.



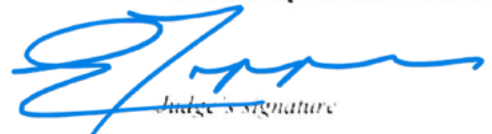
Complainant's signature

Claudia Barrios, Special Agent HSI

Printed name and title ID#10953

Attested to by the Applicant in accordance with the requirements of Fed.R.Crim.P. 4.1 by Telephone

Date: June 23, 2025



Judge's signature

City and state: Miami, Florida

Honorable Edwin G. Torres, United States Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Claudia Barrios, having been first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with Homeland Security Investigations (“HSI”) and have been so employed since 2024. I am currently assigned to the Special Victims Group at the HSI Miami Field Office and have served in this position since July 2024. I am an “investigative or law enforcement officer” of the United States within the meaning of Title 18, United States Code, Section 2510(7). That is, I am an officer of the United States who is empowered by law to conduct investigations of, and make arrests for, offenses enumerated in Title 18, United States Code, Sections 2422, 2423, 2251, and 2252.

2. I have participated in investigations involving people who collect and/or distribute child pornography, along with the importation and distribution of materials relating to the sexual exploitation of children. I have received training on the topic of child pornography and child exploitation, and, during the course of my duties, I have observed and reviewed examples of confirmed child pornography. I have also reviewed examples of materials relating to the sexual exploitation of children in all forms of media including computer media and have discussed and reviewed these materials with other law enforcement officers.

3. This Affidavit is made in support of a criminal complaint against Jacob Melvin HART, whose date of birth is 08/31/1979, for transportation of material involving the sexual exploitation of minors, in violation of 18 U.S.C. § 2252(a)(1), and (b)(1), and for possession of material involving the sexual exploitation of minors, in violation of 18 U.S.C. § 2252(a)(4)(B) and (b)(2) (collectively, the “TARGET OFFENSES”).

4. The statements contained in this Affidavit are based upon my personal knowledge,

as well as on information provided to me by other law enforcement officers. This Affidavit does not include every fact and circumstance known to me, but only facts and circumstances that I believe are sufficient to establish probable cause that HART committed the TARGET OFFENSES on or about June 21, 2025.

PROBABLE CAUSE

5. On or about June 21, 2025, HART entered the United States at Miami International Airport, via Eastern Air Express Flight Number BBQ608, from Cap-Haitien, Haiti. HART was selected for secondary inspection by U.S. Customs and Border Protection (“CBP”) officers.

6. At secondary inspection, CBP officers inspected HART’s personal property, including an Apple iPhone 14 Pro Max mobile phone, an Apple iPad Pro, an Apple Watch, and an Apple MacBook laptop. HART told officers that he owned the devices and provided the passcodes to unlock them.

7. A CBP officer conducted a manual inspection of HART’s Apple iPhone and discovered several videos of suspected child pornography located in a hidden, password-protected folder album in the iPhone’s photo gallery. The hidden album was accessed using the passcode provided by HART. Your Affiant previewed some of the video files located in the hidden folder and observed at least approximately 33 videos depicting child pornography to include the following:

a. An approximately 2-minute 1-second video depicting a nude female, who appears to be between the ages of 10 and 13, with exposed genitalia masturbating with a child’s toothbrush, dated on or about August 16, 2022;

b. An approximately 5-minute and 21-second video depicting a nude female, who appears to be a minor, performing oral sex on another minor female with exposed

genitalia, dated on or about April 24, 2022; and

c. An approximately 26-second video depicting a nude female, who appears to be between the ages of 10 and 13, with exposed genitalia masturbating, dated on or about February 17, 2023.

8. Law enforcement also observed what appeared to be over approximately 160 artificial intelligence (AI) images and videos depicting nude prepubescent and minor females on HART's Apple iPhone.

9. Law enforcement conducted a recorded post-*Miranda* interview of HART. During the interview, HART indicated that he owned the Apple iPhone for approximately 2 years and provided the phone number and passcode to his device. When asked about the videos on his phone, HART asked if this was in reference to the AI generated videos, to which HART then explained that he generates them from a website that he pays a monthly subscription for, prompting it to create videos of naked 13-year-old girls.

10. Law enforcement later showed HART a video from the hidden folder of the iPhone photo gallery dated September 25, 2022, of a nude female, who appears to be between the ages of 10 and 13, with exposed genitalia masturbating with a child's toothbrush, to which he acknowledged that he recognized the video and stated that he possibly downloaded it from a peer-to-peer network.

11. Law enforcement showed HART another video in the hidden folder of the iPhone dated November 6, 2023, of a screen recorded conversation in which HART states, "yea send video for 2-3 stickers" and later states "at least 1 min." The videos sent depict a naked prepubescent female. HART disclosed that the screen recorded video is of HART having a conversation on a Russian chatting application, VK. HART explained that he would communicate with teenage girls

to receive videos from them in exchange for "stickers" within the application. HART also disclosed that he was a youth pastor in Oregon and was arrested in 2006 for invasion of privacy for placing a hidden camera in the girl's bathroom/shower room at a Christian camp.

12. Your Affiant confirmed that HART was convicted of invasion of personal privacy in 2006 for this conduct.

CONCLUSION

13. Based on my training and experience, as further supported by the facts set forth in this Affidavit, I respectfully submit that there is probable cause to believe that on or about June 21, 2025, in the Southern District of Florida, HART did knowingly violate Title 18, United States Code, Section 2252(a)(1) and (b)(1), Transportation of Child Pornography and Title 18, United States Code, Section 2252(a)(4)(B) and (b)(2), Possession of Child Pornography.

FURTHER AFFIANT SAYETH NAUGHT.



CLAUDIA BARRIOS
SPECIAL AGENT
HOMELAND SECURITY INVESTIGATIONS

Attested to by the Applicant in accordance with the requirements of Fed. R. Crim. P. 4.1
by Telephone this 23rd day of June 2025.



HONORABLE EDWIN G. TORRES
UNITED STATES MAGISTRATE JUDGE